

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LUIS VELASQUEZ, on behalf of himself and others :
similarly situated, :

Plaintiff, :

-against- :

SHOGY MARKETPLACE CORPORATION :
d/b/a MANHATTAN MARKETPLACE & ORGANICS, :
and HAFTHADYN SALEH, :

Defendants. :
-----X

Case No. 24-CV-2745
(PAE) (RFT)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Declaration of Justin Cilenti, dated January 21, 2025, and the exhibits attached thereto, and the attached Memorandum of Law, and upon all prior proceedings heretofore had herein, Plaintiff will move this Court, before the Honorable Paul A. Engelmayer, U.S.D.J., at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York New York 10007, on a date and time fixed by the Court, for an Order:

- (a) enforcing the terms of the settlement agreement reached between the parties ("Agreement");
- (b) entering judgment against Shogy Marketplace Corporation and Hafthadyn Saleh (collectively, the "Defendants"), jointly and severally, in the amount of \$25,220, which equals unpaid principal, liquidated damages, and attorneys' fees resulting from the Defendants' breach of the Agreement; and
- (c) granting such other and further relief that the Court deems just and proper.

Dated: New York, New York
January 21, 2025

Yours, etc.,

CILENTI & COOPER, PLLC
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By: /s/ Justin Cilenti
Justin Cilenti

TO:

Mohammad Al Sawaeer, Esq.
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Brooklyn, New York 11209
Attorneys for Defendants

To the extent defendants oppose plaintiff's motion, defendants are to file an opposition by next Wednesday, January 29, 2025. Failure to do so will result in the Court treating plaintiff's motion as unopposed. No replies are invited.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

Date: January 22, 2025